

## Section 1. Registration Information

### Source Identification

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Facility Name:	Dana Corporation
Parent Company #1 Name:	Dana Corporation
Parent Company #2 Name:	

### Submission and Acceptance

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Submission Type:	Re-submission
Subsequent RMP Submission Reason:	Voluntary update (not described by any of the above reasons)
Description:	
Receipt Date:	24-Feb-2020
Postmark Date:	24-Feb-2020
Next Due Date:	24-Feb-2025
Completeness Check Date:	07-Jul-2020
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	

### Facility Identification

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EPA Facility Identifier:	1000 0023 3384
Other EPA Systems Facility ID:	
Facility Registry System ID:	

### Dun and Bradstreet Numbers (DUNS)

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Facility DUNS:	63137640
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

### Facility Location Address

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Street 1:	210 East Essex Avenue
Street 2:	
City:	Avenel
State:	NEW JERSEY
ZIP:	07001
ZIP4:	
County:	MIDDLESEX

### Facility Latitude and Longitude

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Latitude (decimal):	40.572147
Longitude (decimal):	-074.261640
Lat/Long Method:	Global Positioning System (GPS) Carrier Phase Static Relative Positioning Technique
Lat/Long Description:	Center of Facility
Horizontal Accuracy Measure:	20

Facility Name: Dana Corporation

EPA Facility Identifier: 1000 0023 3384

Plan Sequence Number: 1000085450

Horizontal Reference Datum Name:

World Geodetic System of 1984

Source Map Scale Number:

## Owner or Operator

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Operator Name:

Dana Corporation

Operator Phone:

(800) 733-3262

## Mailing Address

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Operator Street 1:

210 East Essex Avenue

Operator Street 2:

Operator City:

Avenel

Operator State:

NEW JERSEY

Operator ZIP:

07001

Operator ZIP4:

Operator Foreign State or Province:

Operator Foreign ZIP:

Operator Foreign Country:

## Name and title of person or position responsible for Part 68 (RMP) Implementation

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RMP Name of Person:

Jim Shields

RMP Title of Person or Position:

Field Supervisor

RMP E-mail Address:

shieldsji@danacompanies.com

## Emergency Contact

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Emergency Contact Name:

Jim Shields

Emergency Contact Title:

Field Supervisor

Emergency Contact Phone:

(800) 733-3262

Emergency Contact 24-Hour Phone:

(800) 733-3262

Emergency Contact Ext. or PIN:

Emergency Contact E-mail Address:

shieldsji@danacompanies.com

## Other Points of Contact

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Facility or Parent Company E-mail Address:

Facility Public Contact Phone:

Facility or Parent Company WWW Homepage  
Address:

## Local Emergency Planning Committee

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LEPC:

Woodbridge Twp OEM

## Full Time Equivalent Employees

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Number of Full Time Employees (FTE) on Site:

30

FTE Claimed as CBI:

## Covered By

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OSHA PSM :

Yes

EPCRA 302 : Yes  
CAA Title V:  
Air Operating Permit ID:

## OSHA Ranking

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OSHA Star or Merit Ranking:

## Last Safety Inspection

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Last Safety Inspection (By an External Agency) 02-Jun-2015  
Date:  
Last Safety Inspection Performed By an External Agency: NJ DEP TCPA

## Predictive Filing

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Did this RMP involve predictive filing?:

## Preparer Information

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Preparer Name: Larry Aleksandrich  
Preparer Phone: (908) 672-2514  
Preparer Street 1: 33 Monroe Avenue  
Preparer Street 2:  
Preparer City: Carteret  
Preparer State: NEW JERSEY  
Preparer ZIP: 07008  
Preparer ZIP4:  
Preparer Foreign State:  
Preparer Foreign Country:  
Preparer Foreign ZIP:

## Confidential Business Information (CBI)

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CBI Claimed:  
Substantiation Provided:  
Unsanitized RMP Provided:

## Reportable Accidents

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Reportable Accidents: See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

## Process Chemicals

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Process ID: 1000106705  
Description: Isocontainer storage  
Process Chemical ID: 1000133543  
Program Level: Program Level 3 process  
Chemical Name: Difluoroethane [Ethane, 1,1-difluoro-]  
CAS Number: 75-37-6  
Quantity (lbs): 540000  
CBI Claimed:  
Flammable/Toxic: Flammable

Process ID:	1000106705
Description:	Isocontainer storage
Process Chemical ID:	1000133544
Program Level:	Program Level 3 process
Chemical Name:	Phosphorus trichloride [Phosphorous trichloride]
CAS Number:	7719-12-2
Quantity (lbs):	225000
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	1000106705
Description:	Isocontainer storage
Process Chemical ID:	1000133545
Program Level:	Program Level 3 process
Chemical Name:	Phosphorus oxychloride [Phosphoryl chloride]
CAS Number:	10025-87-3
Quantity (lbs):	315000
CBI Claimed:	
Flammable/Toxic:	Toxic

## Process NAICS

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Process ID:	1000106705
Process NAICS ID:	1000107996
Program Level:	Program Level 3 process
NAICS Code:	49319
NAICS Description:	Other Warehousing and Storage

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000085631

Percent Weight:	
Physical State:	Liquid
Model Used:	Areal Locations of Hazardous Atmospheres [ALOHA(R)]
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

- Dikes:
- Enclosures:
- Berms:
- Drains:
- Sumps:
- Other Type:

Toxic Worst ID: 1000085632

Percent Weight:	
Physical State:	Liquid
Model Used:	Areal Locations of Hazardous Atmospheres [ALOHA(R)]
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

- Dikes:
- Enclosures:
- Berms:
- Drains:
- Sumps:
- Other Type:

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000091206

Percent Weight:	
Physical State:	Liquid
Model Used:	Areal Locations of Hazardous Atmospheres [ALOHA(R)]
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Urban

Passive Mitigation Considered

- Dikes:
- Enclosures:
- Berms:
- Drains:
- Sumps:
- Other Type:

Active Mitigation Considered

- Sprinkler System:
- Deluge System:
- Water Curtain:
- Neutralization:
- Excess Flow Valve:
- Flares:
- Scrubbers:
- Emergency Shutdown:
- Other Type:

Toxic Alter ID: 1000091205

Percent Weight:	
Physical State:	Liquid
Model Used:	Areal Locations of Hazardous Atmospheres [ALOHA(R)]
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Urban

Passive Mitigation Considered

- Dikes:
- Enclosures:
- Berms:
- Drains:
- Sumps:
- Other Type:

Active Mitigation Considered

- Sprinkler System:
- Deluge System:
- Water Curtain:
- Neutralization:
- Excess Flow Valve:
- Flares:

Scrubbers:

Emergency Shutdown:

Other Type:

Section 4. Flammables: Worst Case

Flammable Worst ID: 1000064340

Model Used:  
Endpoint used:

Aloha  
1 PSI

Passive Mitigation Considered

Blast Walls:  
Other Type:



## Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000060276

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Model Used:

Aloha

### Passive Mitigation Considered

Dikes:

Fire Walls:

Blast Walls:

Enclosures:

Other Type:

### Active Mitigation Considered

Sprinkler System:

Deluge System:

Water Curtain:

Excess Flow Valve:

Other Type:

## Section 6. Accident History

No records found.

## Section 7. Program Level 3

### Description

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No description available.

### Program Level 3 Prevention Program Chemicals

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Prevention Program Chemical ID:	1000112657
Chemical Name:	Phosphorus trichloride [Phosphorous trichloride]
Flammable/Toxic:	Toxic
CAS Number:	7719-12-2

Process ID:	1000106705
Description:	Isocontainer storage
Prevention Program Level 3 ID:	1000090497
NAICS Code:	49319

Prevention Program Chemical ID:	1000112656
Chemical Name:	Difluoroethane [Ethane, 1,1-difluoro-]
Flammable/Toxic:	Flammable
CAS Number:	75-37-6

Process ID:	1000106705
Description:	Isocontainer storage
Prevention Program Level 3 ID:	1000090497
NAICS Code:	49319

### Safety Information

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Safety Review Date (The date on which the safety information was last reviewed or revised):	12-Jan-2015
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### Process Hazard Analysis (PHA)

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PHA Completion Date (Date of last PHA or PHA update):	12-Jan-2015
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### The Technique Used

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What If:	
Checklist:	
What If/Checklist:	Yes
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	12-Jan-2017

## Major Hazards Identified

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Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	
Overpressurization:	
Corrosion:	
Overfilling:	
Contamination:	
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	
Earthquake:	Yes
Floods (Flood Plain):	Yes
Tornado:	Yes
Hurricanes:	Yes
Other Major Hazard Identified:	

## Process Controls in Use

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Vents:	
Relief Valves:	
Check Valves:	
Scrubbers:	
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	
Interlocks:	
Alarms and Procedures:	
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	
Backup Pump:	
Grounding Equipment:	
Inhibitor Addition:	
Rupture Disks:	
Excess Flow Device:	
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	

## Mitigation Systems in Use

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Sprinkler System:	
Dikes:	
Fire Walls:	
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	
Neutralization:	
None:	Yes
Other Mitigation System in Use:	

## Monitoring/Detection Systems in Use

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Process Area Detectors:  
Perimeter Monitors:  
None: Yes  
Other Monitoring/Detection System in Use:

## Changes Since Last PHA Update

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Reduction in Chemical Inventory:  
Increase in Chemical Inventory:  
Change Process Parameters:  
Installation of Process Controls:  
Installation of Process Detection Systems:  
Installation of Perimeter Monitoring Systems:  
Installation of Mitigation Systems:  
None Recommended:  
None: Yes  
Other Changes Since Last PHA or PHA Update:

## Review of Operating Procedures

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Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 11-Jan-2016

## Training

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Training Revision Date (The date of the most recent review or revision of training programs): 13-Jan-2015

## The Type of Training Provided

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Classroom:  
On the Job: Yes  
Other Training:

## The Type of Competency Testing Used

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Written Tests:  
Oral Tests:  
Demonstration:  
Observation: Yes  
Other Type of Competency Testing Used:

## Maintenance

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Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): 12-Jan-2015

Equipment Inspection Date (The date of the most recent equipment inspection or test): 13-Jan-2015

Equipment Tested (Equipment most recently inspected or tested):

Storage container

## Management of Change

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Change Management Date (The date of the most recent change that triggered management of change procedures):

Change Management Revision Date (The date of the most recent review or revision of management of change procedures): 11-Nov-2014

## Pre-Startup Review

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Pre-Startup Review Date (The date of the most recent pre-startup review):

## Compliance Audits

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Compliance Audit Date (The date of the most recent compliance audit):

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):

## Incident Investigation

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Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

## Employee Participation Plans

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Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 05-Jan-2015

## Hot Work Permit Procedures

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Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 02-Jan-2015

## Contractor Safety Procedures

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Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 08-Mar-2015

Facility Name: Dana Corporation

EPA Facility Identifier: 1000 0023 3384

Plan Sequence Number: 1000085450

Contractor Safety Performance Evaluation Date  
(The date of the most recent review or revision of  
contractor safety performance):

26-Jan-2016

## Confidential Business Information

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CBI Claimed:

## Section 8. Program Level 2

No records found.



## Section 9. Emergency Response

### Written Emergency Response (ER) Plan

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Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?): Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?): Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?): Yes

Healthcare (Does facility's ER plan include information on emergency health care?): Yes

### Emergency Response Review

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Review Date (Date of most recent review or update of facility's ER plan): 05-Jan-2015

### Emergency Response Training

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Training Date (Date of most recent review or update of facility's employees): 13-Jan-2015

### Local Agency

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Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): Port Reading Fire

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (732) 636-0894

### Subject to

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OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120:

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52:

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws: Yes

Other (Specify):

## Executive Summary

### Executive Summary

Dana Corporation stores chemicals at our plant in Avenel, NJ. We have a strong commitment to operate our facility in a safe and responsible manner.

Chemicals are stored at our facility in bulk containers. The difluoroethane and phosphorus trichloride are stored in US DOT approved shipping containers.

#### A. Describe the Accident Release Prevention and Emergency Policies

Dana Corporation takes many precautions to prevent or minimize accidental release of chemicals. We also have a preventive maintenance program as per DOT designed to maintain the on-going integrity of the vessels, a training program designed to ensure that the systems are operated by qualified personnel, and to respond quickly to system upsets.

#### B. Stationary Source and Regulated Substances Handled

The facility operates a chemical storage system with difluoroethane, phosphorus oxychloride, and phosphorous trichloride which are covered by TCEA and EPA.

#### C. Description of the Accidental Release Prevention Program

The facility has an accident release prevention program that complies with NJDEP TCEA regulations, EPA RMP program, and OSHA PSM program. The prevention program consists of the following elements:

Employee Participation Process Safety Information Process Hazard Analysis Operating Procedures Training  
Contractor Safety  
Pre Start Up Safety Review Hot Work  
Mechanical Integrity Incident Investigation Compliance Audit

#### D. Five Year Accident History

There have been no chemical -related accidents at the Avenel plant in the past 5 years.

#### E. Description of the Emergency Response Program

An emergency response program has been implemented at the Avenel. This program contains procedures describing how the facility will respond to chemical releases and other emergencies, including evacuation procedures.

#### F. Planned Changes to Improve Safety

Dana Corporation is committed to operating our chemical storage system in a safe and responsible manner.